

# **WISCONSIN LEGISLATIVE COUNCIL STAFF**

## ***RULES CLEARINGHOUSE***

**Ronald Sklansky**  
Director  
(608) 266-1946

**Richard Sweet**  
Assistant Director  
(608) 266-2982



**Terry C. Anderson**  
Director  
Legislative Council Staff  
(608) 266-1304

One E. Main St., Ste. 401  
P.O. Box 2536  
Madison, WI 53701-2536  
FAX: (608) 266-3830

## **CLEARINGHOUSE RULE 00-097**

### **Comments**

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]**

### **2. Form, Style and Placement in Administrative Code**

a. Is the portion of the department’s analysis that describes the key features of the 2000 edition of the Uniform Standards of Professional Appraisal Practice prepared by the department or by the Appraisal Standards Board? If the latter, that should be indicated in the analysis.

b. The “key features” summary references consecutive line numbers to the text of the uniform standards. Those line numbers are not included in the rule. Therefore, the utility of the key features analysis is severely compromised. Consequently, no attempt was made in reviewing the rule to determine whether the analysis of the key features accurately reflects the uniform standards contained in Appendix 1. The line numbers should be included in the final version of the rule.

c. Does the “key features” analysis give appraisers adequate notice of the changes in the uniform standards?

### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

If the key features analysis is not the product of the Appraisal Standards Board, it is suggested that in the first paragraph, first sentence, the word “released” should replace the phrase “that occurred.” The last sentence of that paragraph implies that the effective date is “based on the input of professional organizations, educators, regulators, and state enforcement agencies.” Presumably, the 2000 edition is based on that input. In the second paragraph, last sentence, it is suggested that “version” replace “action.”